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September 27, 2023

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Akeem Oliver v. City of New York, et al., 19 Civ. 11219 (PGG) (JLC)

Your Honor:

I am a Senior Counsel in the New York City Law Department, one of the attorneys representing defendants City of New York, Board of Education of the City School District of the City of New York (“DOE”), Sonhando Estwick, Carry Chan, and Kristine Mustillo (“the DOE defendants”) in the above-referenced matter. I write on behalf of the parties to request an extension of time to file the parties’ motions for summary judgment, from October 16, 2023, to November 16, 2023.

The reason for the instant request is that I am currently prepping for a trial that is scheduled to begin on October 16, 2023, in the matter of Tameka Hayes v. City, et al., 20-CV-1199 (LJL)(SDA). Additionally, co-counsel for the DOE defendants, Christopher Arko, is currently on paternity leave. Given the trial and my co-counsel’s unavailability, additional time is necessary for the filing of the parties’ motions for summary judgment.

The parties have met and conferred and have created the following briefing schedule that accommodates the parties’ individual schedules:

- Moving papers to be due by November 16, 2023;
- Opposition papers to be due on December 18, 2023; and
- Replies to be due on January 5, 2024.

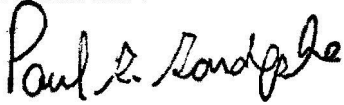
Accordingly, the parties respectfully request that the Court grant an extension of time for their motions for summary judgment, and that the Court endorse their proposed briefing schedule.

We thank the Court for its consideration herein.

Respectfully submitted,

/s/ Maria Fernanda DeCastro
Senior Counsel

SO ORDERED.

A handwritten signature in black ink, reading "Paul G. Gardephe". The signature is written in a cursive, flowing style. The first letter "P" is large and loops around the rest of the name. The signature is positioned above a horizontal line.

Paul G. Gardephe
United States District Judge
Date: October 3, 2023